

Data Management

Status of Action Items from 2002 Data Verification

Most issues from the last data verification conducted in June 2002 have been addressed through semi-annual progress reports during FY '03 and '04. The remaining issue was failure of systems to comply with the 3-year monitoring period for sampling for lead and copper. WVDHHR worked with a few systems to bring them back into compliance and then focused on transitioning all systems that are on a 3-year sampling period to sampling at the same time (06/01 - 09/30). The transition was complete as of December 2004.

WVDHHR's most recent data verification was held during the week of July 11, 2005. EPA expects a draft report from **Confidential Business Info** in the near future. At such time, EPA will submit a copy to the state for review and comment. Upon issuance of a final report, WVDHHR will be asked to develop an action plan to address any deficiencies.

Highlights

WVDHHR has worked hard to address data errors. The staff have done a good job in submitting quarterly updates and have been very cooperative in their attempts to alleviate data problems. They completed data input of all missing/incorrect latitude/longitude data in SDWIS/Fed and reduced many errors by providing treatment objectives and processes for treatment plants. WVDHHR is currently testing the FedRep v 1.2 validation tool with XML data (new format) for inventory, violations and enforcement actions and samples. FedRep is part of the modernization of SDWIS/Fed and works as a data edit check program, checking data prior to it going into SDWIS/Fed and noting any errors that the state should correct. This assists states in submitting error-free reports to SDWIS/Fed.

EPA expects to receive XML data only from the state by November 15, 2005 (standard 45 days after the end of the 4th quarter). EPA will work with WVDHHR through December 31, 2005, to process corrections. During this time, EPA will be processing XML data files to the new Operational Data Storage (ODS) Warehouse.

We appreciate in particular, the work of WVDHHR's Compliance and Enforcement Unit to meet both EPA and State goals. Their efforts to bring facilities into compliance and to submit files to address small data matters have contributed to the improvement of the state's data in SDWIS/Fed.

There have been no major changes in the number of systems on the Significant Non-Compliance (SNC) List. For FY'04, the average number of SNC systems was ninety-two (92). It should be noted that the SNC statistics reported by EPA are always one quarter behind because of the lag time in transmitting data. By the time data is sent from the state and processed in SDWIS/Fed, a number of systems may have already returned to compliance.

The March 8, 2004 memo from the EPA Office of Ground Water Drinking Water regarding state

non-reporting to SDWIS stated that West Virginia's data for the Lead and Copper Rule (LCR) showed no sampling results for the 90th percentile determinations for the period January 2000 through September 2003 for large and medium public water systems. It was determined that this problem was occurring because WVDHHR was reporting the 90th percentile results in SDWIS/State but was not using the module that uploads the data to SDWIS/Fed. The state responded, with the assistance of a contractor, to have the data loaded into SDWIS/Fed. Now that the LCR data is current, EPA encourages WVDHHR to maintain the accuracy of data in SDWIS/State and ensure timely uploads to SDWIS/Fed.

Action Item

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Recommendation

EPA recommends that the state perform a post-migration validation step to SDWIS/State when reviewing the SDWIS/Fed error report for lead and copper sampling data and avoid resending data that has already been accepted by SDWIS/Fed. This should prevent future data problems. Staff may contact the SDWIS/State hotline at (703) 292-6298 for additional assistance.